

SUBMISSION ON THE PROPOSED NATIONAL POLICY STATEMENT FOR URBAN DEVELOPMENT CAPACITY

TO: MINISTRY FOR THE ENVIRONMENT

SUBMITTER: HORTICULTURE NEW ZEALAND

INTRODUCTION AND OVERVIEW

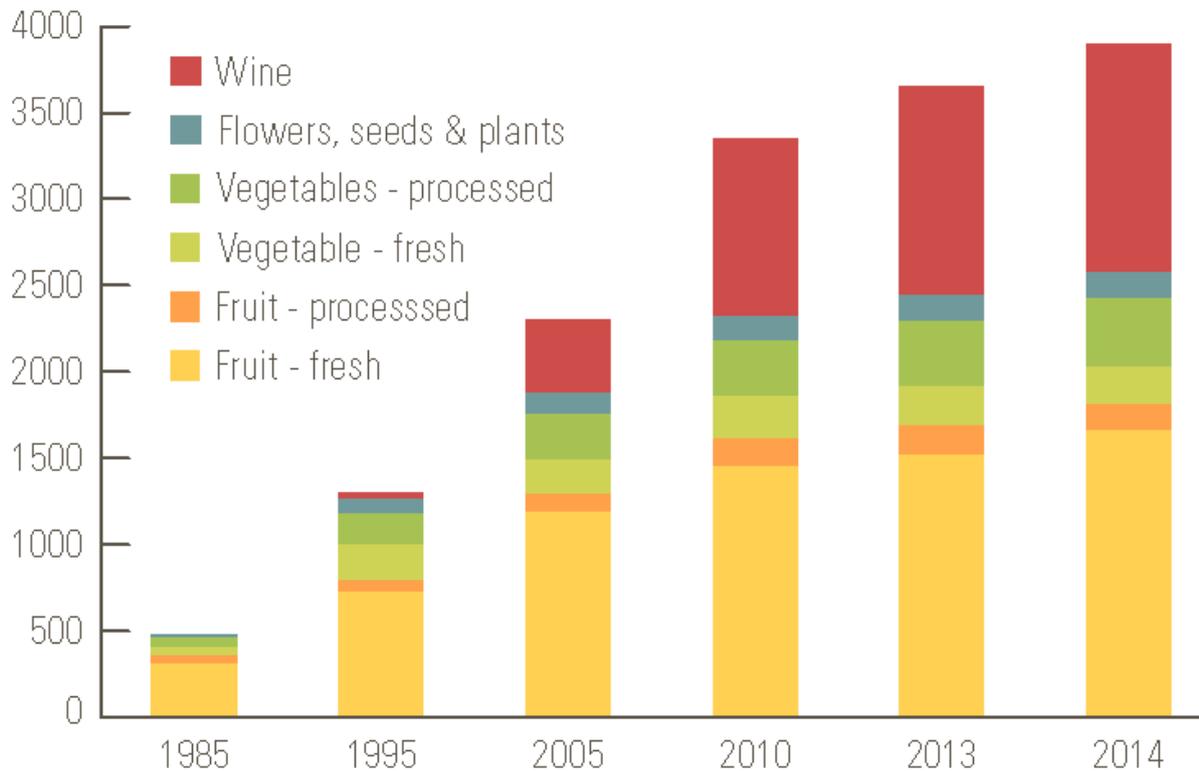
1. Horticulture New Zealand ("**Horticulture NZ**") welcomes the opportunity to make a submission on the proposed National Policy Statement for Urban Development Capacity ("**PNPS**").
2. To provide context for its comments, this submission commences with an overview of Horticulture NZ before it turns to considering the issues with the PNPS in its current form, which include:
 - (a) Lack of spatial planning and specificity regarding the extent of the urban areas;
 - (b) Inefficient allocation of scarce land resulting in land-banking/property speculation;
 - (c) Uncertainties regarding the plan and policy change process;
 - (d) Failure to consider reverse sensitivity issues;
 - (e) Provision, timing and funding of adequate infrastructure;
 - (f) Relationship with other national policy statements ("**NPSs**");
 - (g) Lack of consideration of rural productive uses;
 - (h) Lack of consultation;
 - (i) Estimating sufficient development capacity; and
 - (j) Miscellaneous matters.

HORTICULTURE NEW ZEALAND

3. Horticulture NZ was established on 1 December 2005, combining the New Zealand Vegetable and Potato Growers', New Zealand Fruitgrowers' and New Zealand Berryfruit Growers Federations.

4. On behalf of its 5,600 active grower members Horticulture NZ undertakes detailed involvement in resource management planning processes as part of its National Environmental Policy. Horticulture NZ also works to raise growers' awareness of the Resource Management Act 1991 ("**RMA**") to ensure effective grower involvement in planning processes and resource consent applications. The principles that Horticulture NZ considers in assessing the implementation of the RMA include:
 - (a) Science should underpin the basis of all advocacy;
 - (b) The effects based purpose of the RMA;
 - (c) Non-regulatory methods should also be employed by councils;
 - (d) Regulation should impact fairly on the whole community, make sense in practice, and be developed in full consultation with those affected by it;
 - (e) Early consultation of land users in plan preparation; and
 - (f) Ensuring that RMA plans work in the growers interests both in an environmental and "right to farm" sense.
5. Since 1997 Horticulture NZ has been, and continues to be, an active participant in the regional and district planning processes since 1998 and has emphasised expert based involvement since 2005. Horticulture NZ's investment in this activity is significant. For example, in the Financial Year to 2016 \$1.3m was expended by Horticulture NZ on resource management and environment advocacy work. This included evidence preparation and submissions on more than 48 plans and variations, more than 20 council hearings on decisions, 30 appeal discussions or mediations and 3 Environment Court Hearings.
6. Horticulture New Zealand has also participated in and supported grower involvement in collaborative planning processes at the regional and national level, and now has a science investment programme focussed on delivering better understanding and stewardship of natural resources. As part of this programme we have been involved in nine regional collaborative planning processes and administer science contracts over a yearly value of \$1million.
7. Horticulture in NZ is a growth industry (see Figure 1 below). Total horticulture merchandise exports in 2014 were over \$1.65 billion, an increase in value of nearly seven percent on 2013 (can't calculate as we don't know the change in wine) horticultural produce exports. Three horticulture crops kiwifruit; apples (fresh & processed); and potatoes (fresh, frozen & processed); were collectively 64% of the value of New Zealand's horticultural produce exports in 2014.

Horticultural exports – Years to June (\$ million, fob)



Source: Statistics New Zealand

Figure 1 Exports in NZ horticulture over time

8. Increased export values of greater than \$10m were in:
 - Apples (\$61m/+13% on 2013);
 - Avocados (\$59m/+176%);
 - Other processed fruit (\$13m/+17%); and
 - Potatoes (\$11m/+12%).
9. Other major export crops are onions who are in a growth phase, predicting returns to be up 50% on 2015, from \$81 million to \$125 million FoB, and processed peas (\$80m). Vegetable seed exports, dominated by radish seed and carrot seed, fell \$14m (18%), but at \$66m vegetable seeds are significant exports. The value of New Zealand kiwifruit exports in 2015 at \$1.182 billion FoB was 27% above the 2014 and the average value of \$973m for the previous five years.
10. Land under horticultural crop cultivation in New Zealand is calculated to be approximately 87,140 hectares.

11. In addition to fruit, vegetables, flowers, seeds and bulbs exported the New Zealand horticultural sector also exported:
- Natural honey exports of \$187m was an increase of \$42m (29%) on 2013 (2008 \$62.6m). Bees and pollination are an integral part of New Zealand's horticulture.
 - Export of horticultural machinery and components, valued at \$75m (free-on-board), primarily for cleaning, sorting and grading fresh and dried fruit and vegetables were exported in 2014 (\$47.2m in 2008).
 - Income to New Zealand companies in the form of royalties and licence agreements are in addition to these component exports.

Domestic production

12. Combined domestic sales value of horticulture products are calculated to exceed \$3.2 billion and exports of \$3.9 billion has the value of New Zealand's horticultural outputs exceeding \$7 billion for the first time.
13. Domestic production dominates the vegetable sector and is a core element of New Zealand's food network. Parts of the domestic supply chain are in our view now being affected by constraints on production that are influenced by the availability of suitable land. Effects tend to result in increased prices for access to products that are staples of the New Zealand food basket such as carrots, potatoes and leafy greens. The most crucial issue is the timing of production; with potential for shortages at key times of the year if resource access is not managed strategically.
14. The key constraints to growth in horticultural production, which are the basis for this submission, remain access to the factors of production - in particular, land and water. Of the 5.5% of land available for production in New Zealand roughly 1/10th was subdivided for lifestyle blocks in the last 15 years. Access to water and land is becoming a key constraint to growth because of competition for versatile land for housing, the availability of water at high reliability, and water quality constraints.
15. Horticulture is a very efficient high value industry. For a comparison, ~50,000 people are employed in the >\$7Bn industry, operating off ~123,000ha. Dairy returns around \$18Bn, employs 30,000 people off a footprint of ~2.5million hectares. Increasingly, iwi based agribusiness is looking to expand into horticulture and Horticulture NZ has supported these groups to do so.

ISSUES WITH PNPS

Lack of spatial planning and specificity regarding the extent of the urban areas

Discussion

16. Horticulture NZ considers one significant flaw in the PNPS is that it does not provide for, nor require any strategic spatial planning. Horticulture NZ considers that the spatial planning process undertaken in Auckland was a significant step in identifying what uses should be encouraged in what areas throughout the region. The spatial planning process needs to be undertaken elsewhere in New Zealand and ideally be done to assist with strategic infrastructure planning for the broader New Zealand community. For the horticulture sector having alignment between its current and future planning processes and that which looks at both the primary production sector and the country as a whole is critical. Such planning provides the tools and analysis that forms the basis of decision making around the allocation of our natural resources, be those land or water. Spatial planning provides certainty for those that manage and use resources and importantly for rural land users, informs decisions on economic investment.
17. A key part of Horticulture NZ's submission on the Resource Legislation Amendment Bill 2015 was to ensure that rural land with high production potential (versatile lands) were protected in light of the urban development.¹ That submission described what versatile soils are, the nature of the problem, the reasons why such lands needed to be protected, and concerns with the proposed elevation of development capacity over other uses.
18. These comments apply equally to the PNPS and for convenience a copy of that submission is attached as **Appendix 1**. For the benefit of doubt, Horticulture New Zealand supports the protection of versatile land as part of a broader policy package related to national food chains and recognition of economic opportunities associated with highly productive land.
19. Horticulture NZ is also concerned that there is a lack of specificity and uncertainty regarding what an urban area is, and more importantly the extent or scope of that area. While the PNPS includes a definition which defines an urban area as one with urban characteristics and a moderate to high concentration of population, it is not clear whether such areas are limited to existing urbanised (residential and business) areas, or would include rural land on the periphery. For example, the classifies "Northern/Western/Central/Southern Auckland Zone" as a main urban area

¹ Refer Horticulture NZ Submission on the Resource Legislation Amendment Bill 2015 dated 26 April 2016, at Section One – Protecting Versatile Land in Light of the Urban Development of Rural Land.

and “Pukekohe” as a secondary urban area in Appendix A2 without any indication of the extent of those areas.

20. Auckland, and Pukekohe in particular are important areas for the horticulture industry, and Horticulture NZ is therefore concerned to ensure that prime horticultural land is not unintentionally (or indeed intentionally) captured as part of the urban areas.
21. Furthermore, it provides no guidance on whether rural and coastal settlements (serviced, unserviced or partially serviced) are deemed urban or rural and the status of these areas in growth management. These are not main or secondary urban areas by definition but in Auckland these outlying settlements (beyond the rural urban boundary) have been subject to the same development demand pressures as the rest of Auckland. Examples include Patumahoe, Glenbrook Beach, Kingseat, Clarkes Beach, Bombay where small incremental growth of a rural or coastal settlement has been replaced with Special Housing Areas and reticulated services to public storm and waste water systems. No longer small settlements but rapidly expanding urban areas in the rural environment. The same pressures are bearing down on Waikato settlements like Tuakau and Pokeno on the Auckland doorstep with an apparent disconnect to Auckland growth plans.

Recommendations

22. That spatial planning be required for all regions in New Zealand. Define no go areas and provide security they will not be affected by unplanned, opportunistic and sporadic development to ensure ongoing activity and sustained investment in the rural sector and certainty to urban form.
23. That the PNPS be amended so that the assessments and monitoring required thereunder are required to be informed by spatial planning in the relevant regions.
24. That the definition of urban areas be amended to clarify that it only applies to existing urbanised (residential/business zoned) areas and does not apply to any rural productive land.
25. Define a third category or urban settlement covering rural and coastal settlements.

Inefficient allocation of scarce land resulting in land-banking / property speculation

Discussion

26. The PNPS currently requires councils to set aside significantly more land for urban uses than they consider will be required in both the short/medium term (extra 20%) and long-term (extra 15%).
27. Such a requirement may be removing rural land from productive uses when it is not required for that purpose in the short, medium or long term. Productive rural land is a scarce resource and effectively quarantining the land in advance is not an inefficient use of such a resource.
28. More importantly, it will encourage (rather than discourage) further land banking/property speculation and will have flow on impacts on the productive rural and horticultural sectors. It is also important to note that the mere provision of more land for urban uses does not mean more houses (and in particular more affordable housing) will be built in the short/medium or long-term. Whether that opportunity is taken up depends on the developers and market conditions.
29. This dilemma is made worse by Council having to telegraph designation of land for infrastructure a long time in advance of having the right to acquire the land. This provides an unfair opportunity for speculator price elevation and increases the cost of infrastructure development.
30. Auckland Council has advised the sector that there is enough land capacity within the Metropolitan Urban Limit to meet roughly 75% of the projected demand but they have no powers to deal with developers who refuse to release the land once it has been rezoned. Councils should be given an ability to manage this, because of the externalised effects on the community of increased infrastructure provision, land scarcity and elevated house prices.
31. This is backed up by public comments from Auckland Council:

*"We've got a housing crisis. We don't necessarily have a land-supply crisis, and I think that's what continues to distort and divert the conversation."*²
32. Horticulture NZ opposes any requirement to set aside more land than is estimated to be required in the short, medium or long-term and considers more needs to be done to address land banking and speculative property purchases.

² Penny Hulse; Auckland Council to NBR June 19 2016 Article: "Hulse wants use-it-or-lose-it clause for land bankers."

Recommendations

33. That policy PD5 be amended to delete the requirement to provide additional margins for capacity as follows:

~~To take account of the likelihood that no all capacity will be developed, it must require an additional margin of at least:~~

- ~~• 20% over and above projected short and medium term demand; and~~
- ~~• 15% over and above projected long term demand.~~

34. That further consideration be given as to how the PNPS can be amended to discourage land-banking and speculative property purchases.
35. That further investigation be undertaken into enabling councils to better encourage and if necessary compel the release of land for urban purposes once it has been rezoned.
36. Explore alternative methods to discourage land-banking and speculative property purchases including rates disincentives on Future Urban Land where that land has and is not used for rural production.
37. Remove the ability for decisions about land use rules to be made by property owners privately (for example through covenants). This has had a significant adverse effect on resource management in New Zealand.

Examples include:

The privately imposed restrictions on rural land use activities placed on lots through rural subdivision.

Sterilisation of brownfield development opportunities in urban areas by previous occupiers and activities to protect trade.

- 38.

Uncertainties regarding the plan and policy change process

Discussion

39. The PNPS states that regional councils are required to change objectives and policies in their policy statements to give effect to the PNPS without going through the Schedule 1 process. No express mention is made of regional plans or of district documents. However, the requirement in section 55(2A) of the RMA applies to all regional and district documents and is not limited to the regional policy statement.
40. Further, and while the section 55(2A) requirement only applies to objectives and policies and not rules, given the interdependence of the two, and the ability of some policies to be directive, the public's opportunity to influence

the outcome of the resultant plan change processes may be quite limited. In other words, the die may already be cast by the time the plan change is notified for submissions. This is particularly concerning given the issues with the PNPS as set out in this submission.

41. While understanding the PNPS is directed at ensuring sufficient urban residential and urban capacity is available, Horticulture NZ considers that the PNPS cannot, and should not do this in a vacuum. The PNPS also needs to consider and balance the needs of the wider community and provide them with a proper opportunity to participate in and make submissions on changes that may affect them.

Recommendations

42. That in terms of the process to give effect to the PNPS:
 - (a) only those objective and policies in the regional policy statement and regional and district plans which are necessary to give effect to the PNPS will be changed without using the Schedule 1 process;
 - (b) any other complementary objectives and policies and all rules will be changed using the applicable plan change process.³

Reverse sensitivity issues

Discussion

43. The consultation document notes that the PNPS does not address reverse sensitivity since it is a complex area and would require more analysis than has been possible. Horticulture NZ does not consider that this is an acceptable response. A NPS is meant to provide national guidance on key policy issues – it is important that it considers all relevant factors, in doing so.. If it could be reasonably anticipated that the policy will have reverse sensitivity effects, the analysis should be completed for the Regulatory Impact Statement. To externalise costs to others without assessing these costs should not be considered good practice.
44. Horticulture NZ agrees that reverse sensitivity can be a complex area, Horticulture NZ is not seeking that the PNPS provide detailed solutions for how it must be addressed as that is more appropriately dealt with at the local level in district plans. What Horticulture NZ is however seeking is recognition that such issues may arise and a process for addressing the issues. Horticulture NZ considers that this could be achieved through including a reference to reverse sensitivity in the matters to be considered under policy

³ The term “applicable” is used here given the changes proposed in the Resource Legislation Amendment Bill to introduce alternative plan change processes.

PB3 as well as an obligation to consult with potentially affected parties under policies PB4 and PD9.

45. At present, the PNPS fails to address the well documented issues that arise at the rural urban interface or identify in PB4 and PD9 that the rural sector is the specific stakeholder that must be consulted in carrying out assessments under PB1. The PNPS as a whole is silent on or deliberately ignores the critical edge at which urban activities finish and rural production use provisioning food to urban areas starts.

Recommendations

46. That policy PB3 be amended to include reverse sensitivity as a matter to be taken into account as follows:

- *The potential for reverse sensitivity issues to arise;*

47. That policies PB4 and PD9 be amended to require consultation as follows:

PB4: In carrying out the assessments required under policy PB1, local authorities must consult with infrastructure providers, community and social housing providers, the property development sector, and where the assessments may affect production land - affected rural landowners and the productive rural use sector, and any other stakeholders as they see fit.

PD9: In developing this strategy local authorities must:

- *Be informed by the Housing Assessment and Business Land Assessment required under policy PB1;*
- *~~Take into account the views of~~ Consult with infrastructure providers, landowners, the property development sector, and where the assessments may affect production land the productive rural use sector, and any other stakeholders as they see fit; and*
- ...

The provision, timing and funding of adequate infrastructure

Discussion

48. Horticulture NZ considers that there are three key issues in relation to the provision of infrastructure. These relate to the adequacy of infrastructure, the timing of infrastructure and proposed sources of funding for infrastructure.

Adequacy

49. In terms of adequacy, there is reference in the definition of development capacity to the need to take into account the provision of "adequate infrastructure existing or likely to exist to support the development of land".

However, unlike the term “sufficient” which is defined in relation to development capacity, no definition or guidance is provided as to what is adequate infrastructure. Horticulture NZ suggests that a definition in this regard would be helpful.

50. For consistency, Horticulture NZ also considers that Policy PB3 should be amended to refer to the adequacy of infrastructure.

Timing

51. In relation to timing, while recognising that infrastructure will be required, the PNPS does not expressly recognise the potential timing delays in the provision of infrastructure and the effect that this will have on development capacity. This is important as if land is activated for urban development prior to the infrastructure being available this can cause issues downstream in terms of consenting (such as how stormwater is dealt with and provided) and also result in unnecessary and inappropriate removal of land from other productive uses. The timing of infrastructure can be affected by a number of factors, some of which are matters outside the control of local authorities. These include: the availability of skilled engineers, project managers and trades people in the infrastructure (and also housing) sector – of which there is currently a shortage; national immigration and macro-economic policies; funding; and the need to involve other parties such as the New Zealand Transport Agency where the development necessitates changes or access to State Highways. Horticulture NZ therefore considers that the PNPS should be amended to specifically require consideration be given to the timing of infrastructure availability.

Funding

52. With respect to funding, the discussion document indicates that costs associated with the provision of infrastructure will be met using a combination of development contributions and rates due to the new ratepayer base that the urban growth will provide. Horticulture NZ has a number of concerns in this regard:

- (a) Given the existing under-provision of infrastructure in some areas, and the limitations on development contributions (in terms of only being responsible for a proportionate share of the growth related costs directly related to a particular development), Horticulture NZ considers that there is likely to be a significant funding shortfall, which could compromise the achievement of the urban growth capacity;
- (b) Given the requirements in policy PD1 to provide development capacity (which includes infrastructure), in the short, medium and long-term, ratepayers could end up footing the bill for infrastructure which is not required for another 20 or 30 years; and

- (c) An over-reliance on development contributions may effectively undermine the policy intent of increasing housing affordability by passing the infrastructure capital costs onto the end consumer (through increased section prices).

53. To ensure that the PNPS meets its aims, Horticulture NZ considers that alternative funding arrangements for infrastructure should be investigated.

Recommendations

54. That a definition for “adequate” infrastructure be included.

55. That the matters the Ministry of Environment (“**Ministry**”) must have particular regard to under policy PB3 be amended to include a reference to “adequate” infrastructure as follows:

- *The actual and likely availability of adequate infrastructure.*

56. That alternative funding arrangements for infrastructure be investigated.

Relationship with other national policy statements

Discussion

57. The PNPS does not currently provide any guidance as to how it relates to other NPSs – such as the NPS for Freshwater Management (“**NPS FM**”) and the New Zealand Coastal Policy Statement (“**NZCPS**”). Horticulture NZ considers that this is particularly important where, as here, the PNPS is likely to be pulling in a different direction to these other NPSs – at least in some respects (increased urban activity versus protection and enhancement of water bodies/coastal environment). While the consultation document notes that the Government is intending to issue non-statutory guidance as to how to balance the PNPS with other NPSs, there are issues with such an approach. Non-statutory guidance is by its nature not mandatory, meaning decision makers can choose whether or not to follow it. Indeed, as the guidance matters are not stated in the RMA or other planning documents, decision-makers may not even be aware of them.

58. Horticulture NZ considers that it would be more appropriate to provide guidance in the PNPS itself (or perhaps even the RMA) as to how it fits with other NPSs. In particular, which NPS trumps/prevails over the other(s) in the event of any conflict.

Recommendation

59. That the PNPS be amended to include specific reference as to how it fits with other NPSs and which NPS prevails in the event of any conflict.

Lack of consideration of rural productive uses

Discussion

60. At present the PNPS does not require that consideration be given to the productive rural use of land. This is especially important where new areas of (what the PNPS refers to as) "undeveloped land" are seeking to be set aside for urban growth. While such land may be undeveloped in the sense of not being urban, it may well be developed in terms of supporting an existing established rural productive use. The particular rural uses, the ability of those uses to transfer elsewhere, the characteristics of the land (such as soil classifications), and the efficiency of the rural productive use versus an urban use are all matters that should be considered.

61. There needs to be explicit recognition of the relationship between rural land and the food security needs of urban areas. No more so is this more clearly demonstrated than in the south Auckland / North Waikato area and the unique rural production characteristics of Pukekohe/Pukekawa.

62.

Recommendation

63. That the matters the Ministry must have particular regard to under policy PB3 be amended to include an additional consideration as follows:

- Whether the land is currently in rural productive use and any particular characteristic(s) of the land (including food security values) which make proposed urban use more or less appropriate

Lack of consultation

Discussion

64. There is no express requirement to consult with the rural sectors or indeed the wider community when determining what further land is required for urban areas under the PNPS.

65. The obligation under policy PB4 to consult when housing and business land assessments are being carried out only extends to infrastructure providers, community and social housing providers, the property development sector and "any other stakeholders as they see fit". While the assessments are focused on estimating the demand for dwellings and business land the assessments also need to consider development capacity to meet demand in the short, medium and long-terms. Capacity, particularly in the long-term is likely to involve significant incursions into rural areas, and there is therefore a need to consider impacts on the productive rural and horticultural sectors. The wording of the policy at present leaves consultation with other

stakeholders to the discretion of the body undertaking the assessments and provides no certainty that those affected by the assessments will be heard.

66. Even more concerning is policy PD7 which requires councils to prepare a future release and land intensification strategy but under policy PD9 only requires the council to “take into account” the views of certain groups (which again do not include the productive rural sectors including the horticultural sector).
67. Horticulture NZ considers it is vital that the views of those representing rural communities have an opportunity to be heard. Consultation with affected parties is a key principle of the resource management system and the PNPS should not look to alter this.

Recommendation

68. That policies PB4 and PD9 be amended as set out in paragraph [41] above (and repeated here for convenience):

PB4: In carrying out the assessments required under policy PB1, local authorities must consult with infrastructure providers, community and social housing providers, the property development sector, and where the assessments may affect production land - affected rural landowners and the productive rural use sector, and any other stakeholders as they see fit.

PD9: In developing this strategy local authorities must:

- *Be informed by the Housing Assessment and Business Land Assessment required under policy PB1;*
- *~~Take into account the views of~~ Consult with infrastructure providers, landowners, the property development sector, and where the assessments may affect production land, the productive rural use sector, and any other stakeholders as they see fit; and*
- ...

Estimating sufficient development capacity

Discussion

69. The PNPS requires each Council to undertake assessments and monitoring of development capacity. Horticulture NZ considers that requiring each individual Council to assess and monitor such matters is not an efficient use of resources and is a matter which could more easily and effectively be undertaken by central government – i.e. the Ministry. Imposing such a requirement on individual councils creates extra work (without any extra funding) in an area in which councils have traditionally had limited involvement. This is particularly given the changes to the Local Government Act in 2012 to refocus the purpose of local government back on the provision of good quality local infrastructure, local public services and the

performance of regulatory functions.⁴ Horticulture NZ considers that the estimation of sufficient development capacity is a task better left with central government.

70. If contrary to the Horticulture NZ's submission, this work is to remain with councils, then further consideration should be given as to how this extra work is resourced and funded. This is particularly since not all ratepayers would necessarily benefit from the work (e.g. the rural sector) but without an alternative funding source the cost is likely to be passed on to ratepayers.

Recommendations

71. That policies PB1 to PB5 be amended to make it clear that:
- (a) the Ministry is responsible for undertaking the housing and business land assessments under PB1 and the monitoring under PB5;
 - (b) the Ministry is required to consult with local authorities when undertaking the assessments;
 - (c) local authorities are required to assist the Ministry by providing information reasonably required by the Ministry for the assessments under PB2, PB3 and PB4.
72. That if, contrary to the submissions made above, the estimation of development capacity is to remain with councils, consideration be given to how the new duties should be resourced and funded.

Miscellaneous matters

Discussion

73. There is reference throughout the PNPS to the "most recent" Statistics New Zealand growth projections and to these projections being attached in an Appendix. It is not clear whether the intention is that this data will be continually updated - and if so the process for that update - or whether the data is intended to be a snapshot at this point in time. Horticulture NZ considers that further clarification of these matters is required.
74. Finally, it is noted that the tables in Appendices A1 and A2 start off being organised in North to South order but then have Kapiti and Blenheim added at the bottom. It is considered that it would be more consistent and user friendly for Kapiti and Blenheim to be integrated into the north to south order.

⁴ Refer section 10(1)(b) of the Local Government Act 2002.

Recommendations

75. That reference to the “most recent” Statistics New Zealand growth projections be amended to refer to the May 2016 projections or that further detail be provided as to how updated projections are intended to be incorporated in the PNPS going forward.
76. That the tables in Appendices A1 and A2 be updated so that all the towns are listed in north to south order.

CONCLUSION

77. Horticulture NZ considers that there are some fundamental issues with the PNPS in its current form. The specific submissions and decisions sought by Horticulture NZ are detailed above.
78. Horticulture NZ thanks the Ministry for the opportunity to present comments on the PNPS and is happy to elaborate on any aspects if required.

DATE: 15 July 2016

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on behalf of **Horticulture New Zealand Limited**

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**APPENDIX 1 – HORTICULTURE NZ SUBMISSION ON RESOURCE LEGISLATION
AMENDMENT BILL 2015**